

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PROJECT VERITAS *et al.*,

*Counterclaim-Defendants,*

*v.*

JAMES O'KEEFE *et al.*,

*Counterclaimants.*

No. 7:23-CV-04533-CS-AEK

**DECLARATION OF MICHAEL J. HARRIS IN OPPOSITION TO  
COUNTERCLAIMANTS' MOTION TO AMEND**

I, Michael J. Harris, hereby swear or affirm as follows:

I am an attorney at law in the State of New York, where I am a member in good standing of the bar, as well as an attorney duly admitted to practice before this Court. I am also counsel for Counterclaim-Defendants Project Veritas and Project Veritas Action Fund (collectively, "PV"). I submit this declaration in opposition to the motion to amend filed by Counterclaimants James O'Keefe and Transparency 1, LLC d/b/a O'Keefe Media Group (collectively, "Counterclaimants"). I submit this declaration based upon my personal knowledge, information, and belief.

1. Attached as Exhibit 1 is a true and correct copy of an email from counsel for Counterclaimants to counsel for PV, dated June 18, 2025.

2. Attached as Exhibit 2 is a true and correct copy of the transcript of a June 9, 2025 hearing before the Honorable Andrew E. Krause, U.S.M.J.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed in Queens, New York.

Dated: July 9, 2025

A handwritten signature in black ink, appearing to read "Michael J. Harris", is written over a horizontal line.

Michael J. Harris